

2013R1243/JSH

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Crim. No.
OKORO IFEANYI : 26 U.S.C. § 7206 & 18 U.S.C. § 2

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the Acting United States Attorney for the District of New Jersey charges:

Count One
(Filing A False Tax Return)

Relevant Individuals and Entities

1. At all times material to this Information:
 - a. Defendant Okoro Ifeanyi (“Ifeanyi”), was a resident of Newark, New Jersey, and owned and operated Amiri Mbubu Auto Sales LLC (“Amiri Mbubu”).
 - b. Amiri Mbubu was an automobile dealer operating in Newark, New Jersey, and elsewhere, which buys automobiles in the United States and ships them to Nigeria.
 - c. The Internal Revenue Service (“IRS”), an agency of the United States within the Department of the Treasury, administered the revenue laws of the United States and, among other responsibilities, assessed and collected federal income taxes.

The Scheme

2. It was part of the scheme to file false tax returns that for tax years 2010 through 2013, that Ifeanyi knowingly and willfully failed to report on Schedule C of his U.S. Individual Income Tax Return, Form 1040, tax returns the majority of the revenue received from operating Amiri Mbubu.

3. It was further part of the scheme that Ifeanyi filed and caused to be filed U.S. Individual Income Tax Return, Form 1040, tax returns for tax years 2010 through 2013 that understated his true tax liability by approximately \$461,085.

The Charge

4. On or about January 24, 2011, in the District of New Jersey, and elsewhere, defendant

OKORO IFEANYI

did knowingly and willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040, corresponding to tax year 2010, which was verified by written declaration that it was made under penalties of perjury, and which return the defendant did not believe to be true and correct as to every material matter as a result of the practices described in paragraphs 2 and 3 above, in that it failed to report additional tax due and owing of \$243,445.

In violation of Title 26, United States Code, Section 7206(1) & Title 18, United States Code, Section 2.

COUNT 2
(Structuring Transactions)

1. Paragraphs 1 through 3 of Count 1 are incorporated as if set forth in full herein.

2. From on or about August 15, 2007 to on or about July 8, 2008, in the District of New Jersey and elsewhere, defendant

OKORO IFEANYI

for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a), with respect to such transactions, knowingly structured, assisted in structuring, and attempted to structure and assist in structuring, transactions with a financial institution by causing no less than approximately \$54,964.12 in United States currency to be deposited in amounts not exceeding \$10,000.

In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d)(2), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

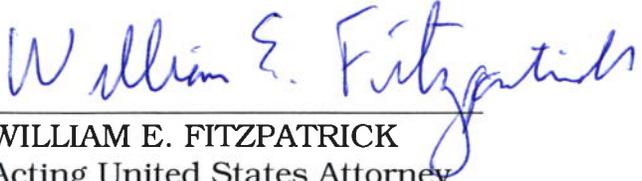
1. The allegations contained in all paragraphs of Counts 1 and 2 of this Information are incorporated by reference as if set forth in full herein for the purpose of noticing forfeitures pursuant to Title 31, United States Code, Section 5317(c)(1).

2. As a result of committing the offense in violation of 31 U.S.C. §§ 5324(a)(3) and 5324(d)(2) alleged in Count Two, defendant OKORO IFEANYI shall forfeit to the United States, pursuant to Title 31, United States Code, Section 5317(c)(1), any and all property constituting or derived from proceeds obtained directly or indirectly as a result of the violation of such offenses, including \$54,964.12 in United States currency.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 31, United States Code, Section 5317(c)(1), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property described above.


WILLIAM E. FITZPATRICK
Acting United States Attorney

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

OKORO IFEANYI

INFORMATION FOR

26 U.S.C. § 7206(1) & 18 U.S.C. 2

A True Bill,

Foreperson

WILLIAM E. FITZPATRICK
ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

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